



MOTOROLA

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

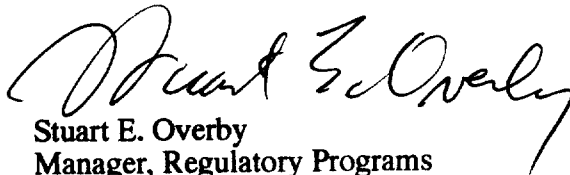
Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Reference: General Docket No. 90-314

Dear Mr. Caton:

Representatives of Motorola held meetings concerning PCS May 11 with Byron Marchant, of Commissioner Barrett's office, May 11 and May 12 with Robert Pepper, Donald Gips and Greg Rosston, of the Office of Plans and Policy, and May 12 with Tom Tycz and Cecily Holiday, of the Common Carrier Bureau. Material used in these meetings is attached.

Sincerely,


Stuart E. Overby
Manager, Regulatory Programs

SEO:amdes

Attachment

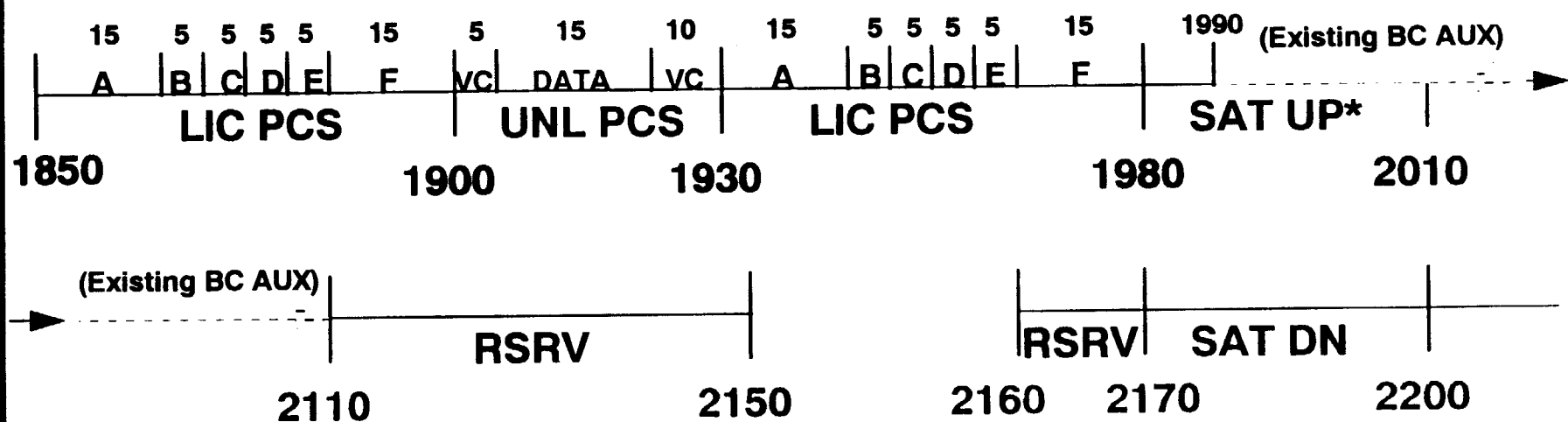
cc: Donald Gips
Cecily Holiday
Byron Marchant
Robert Pepper
Greg Rosston
Tom Tycz

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ALTERNATIVE PCS BANDPLAN FOR CONSIDERATION



LIC PCS	100 MHz ALL AT 1.8 GHz (2 - 30's + 4 - 10's; 40 MHz max per licensee)
UNLIC PCS	30 MHz ALL AT 1.8 GHz (15 MHz DATA, 15 MHz VOICE)
SAT	60 MHz ALL GLOBAL*
RSRV	50 MHz

*FCC must initiate action to make available the 1980-2010/2170-2200 MHz spectrum for satellite use



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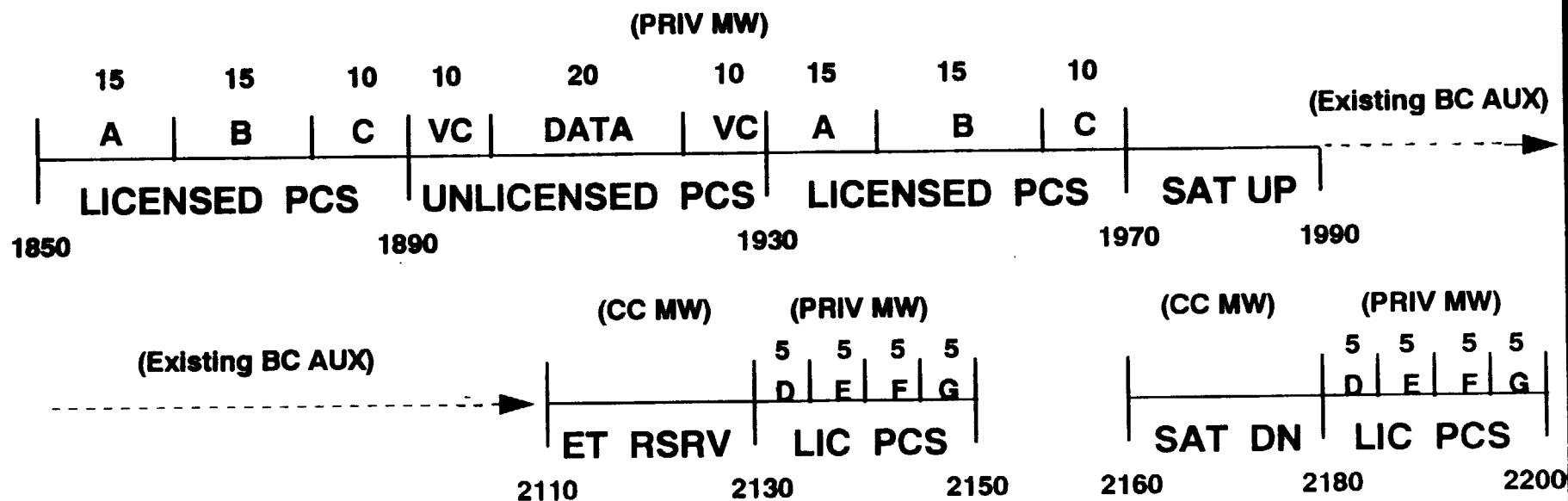
BENEFITS OF MOTOROLA RECOMMENDED ALTERNATIVE PLAN

- **All licensed PCS is within 1.8 GHz, eliminating need for higher cost dual-band subscriber units**
- **The U.S. maintains the flexibility to allocate 2 GHz MSS bands consistent with those identified for global use in WARC-92**
- **A number of PCS license block options are possible**
- **The least congested microwave spectrum is divided equally between unlicensed PCS voice and data**
- **Consumers and industry will benefit from affirmative FCC action on standards**



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FCC SEPTEMBER 1993 PCS DECISION



LICENSED PCS:

120 MHz (80 MHz at 1.8 GHz, 40 MHz at 2.2 GHz (2 - 30's, 1 - 20, 4 - 10's; 40 MHz max per licensee)

UNLICENSED PCS:

40 MHz all at 1.8 GHz (20 MHz Data; 20 MHz Voice)

SATELLITE

40 MHz, only 20 MHz of which is global

EMERGING TECHNOLOGY RESERVE:

20 MHz

1992 WARC MOBILE SATELLITE ALLOCATIONS:

REGION II: 1970 - 2010 UP; 2160 - 2200 DOWN

WORLDWIDE: 1980 - 2010 UP; 2170 - 2200 DOWN

MOTOROLA PROPOSALS FOR OPTIMIZING PCS

I. MOTOROLA TAKES A BROAD PERSPECTIVE ON SPECTRUM ALLOCATION ISSUES.

- Motorola's business interests are best served by sound spectrum allocation policies that optimally accommodate the full family of new wireless services and products on both a global and domestic basis.
- With our many product lines, Motorola's internal approach to spectrum allocation policies confronts many of the same challenges facing the Commission:
 1. Ensuring spectrum homes for diverse services and products aimed at different segments of the business and consumer marketplace.
 2. Ensuring the successful deployment of each of those services and products.
 3. Evaluating competing claims for spectrum and evaluating technical arguments for or against specific options advanced by advocates within the company for specific wireless interests.
- As a result, Motorola's approach to spectrum allocation proposals reflect broad perspectives rather than parochial special interests in individual services or products.

II. MOTOROLA BELIEVES THE FOLLOWING CONSIDERATIONS ARE CRITICAL TO THE COMMISSION'S PCS SPECTRUM ALLOCATIONS PLAN

- Operation across both the 1.8 and 2.2 GHz bands is technically feasible but dual band subscriber units will raise costs to consumers by approximately 25 percent.
- 30 MHz licenses have significant advantages over smaller allocations in overcoming microwave incumbency problems, attracting financing and permitting competitiveness with other wireless service alternatives.
- 10 MHz licenses can be useful in promoting diverse PCS services, such as wireless local loop access, which differ from current offerings.
- Both voice and data unlicensed PCS devices ultimately require clear spectrum; a plan for funding and clearing unlicensed spectrum is critical to unlicensed PCS success.

III. MOTOROLA BELIEVES THAT AN EFFECTIVE BAND PLAN MUST RECOGNIZE AND ACCOMMODATE HARD WON WARC ALLOCATIONS FOR IMPORTANT NEW MOBILE SATELLITE SERVICES, AS WELL AS TERRESTRIAL PCS

- The U.S. waged a significant and successful campaign at WARC to secure vital international spectrum allocations for global mobile satellite systems.
- If given spectrum opportunities, MSS can transform telecommunications throughout the world and provide an essential technology platform for the Global Information Infrastructure.
- The FCC's original PCS decision forecloses the use of 40 MHz of global satellite spectrum.
- A better course of action would be to preserve all or most of that allocation for essential global MSS uplinks and downlinks and subsequently initiate a new proceeding to address 2 GHz long term MSS spectrum needs and the related issue of overlap between U.S. auxiliary broadcast and global WARC 92 MSS bands at 2 GHz.
- The U.S. should not surrender the gains of WARC, irreparably damaging the future of global MSS and U.S. credibility at future conferences.

IV. MOTOROLA BELIEVES THE VISION OF PCS CANNOT BECOME A REALITY WITHOUT AFFIRMATIVE ACTION ON STANDARDS

- Numerous types of equipment and network technologies are being pursued for PCS; Motorola can supply multiple technologies to meet customers needs.
- Proper reconsideration on the standards issue can:
 - Promote high volume, lower cost equipment, interoperability and roaming, and, in turn, consumer satisfaction;
 - Establish credibility of U.S. solutions in the global market, thereby facilitating sales of U.S. products worldwide; and
 - Ensure that U.S. standards policies, such as IPR procedures are employed, regardless of where a particular technology or standard originated.
- Motorola recommends the following action:
 1. The FCC should formally request that industry standards bodies adopt equipment standards on a timely basis.
 2. The FCC's equipment authorization rules should require compliance with timely developed industry standards developed by an ANSI accredited body.